

EXHIBIT G

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

AKARI JOHNSON and
HAZEL THOMPSON,

Plaintiffs, CASE NO.: 4:24-cv-10017-JEM

vs.

MMI 82, LLC, and
THE ENTHUSIAST LLC,

Defendants.

DEPOSITION OF: VALERIE RENEE FRAPP

DATE TAKEN: February 26, 2025

TIME: 10 a.m. - 1:40 p.m.

PLACE: Everyone appeared remotely via Zoom

REPORTED BY: MELISSA FERNANDEZ
Court Stenographer

1 A I did my best.

2 Q Could you please explain what you mean by that?

3 A So at Casa Morada there was like a flood where the
4 water had came through into the back office and there's lots of
5 documents that had been stuck together, like I was trying to
6 look for some papers but if it had rained on some papers like
7 if you tried to pull them apart you couldn't. Everything on
8 the paper would be blurred from the water damage and so that's
9 why I'm saying. I did the best I could. There were so many
10 papers and they were destroyed. You couldn't tell what you
11 were looking at they were so stuck together.

12 Q When you say the documents were destroyed is it the
13 hurricane had hit the building?

14 A I don't know what that would look like because I'm
15 not from Florida so I don't know how a hurricane hitting would
16 make it look but to me it would be like if the river out here
17 at Tapoco overflowed and came in the office and got up in the
18 filing cabinet how it would stick everything together. So to
19 me it looked like flood water or if the roof fell in and the
20 rain was coming in.

21 Q Okay. I'm going to go ahead and show you what I'm
22 marking as Plaintiff's 3.

23 (Whereupon, Plaintiff's Exhibit 3 was marked for
24 identification.)

25 BY MR. BARROUKH:

1 CERTIFICATE OF OATH

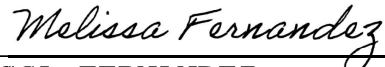
2 STATE OF FLORIDA

3 COUNTY OF HILLSBOROUGH

4 I, the undersigned authority, certify that VALERIE RENEE
5 FRAPP remotely appeared before me and was duly sworn.6 WITNESS my hand and official seal this 26th day of
7 February, 2025.

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11 MELISSA FERNANDEZ
12 Notary Public - State of Florida
Commission No.: HH 278990
My Commission Expires: 6/21/2026

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1 REPORTER'S DEPOSITION CERTIFICATE

2 STATE OF FLORIDA

3 COUNTY OF HILLSBOROUGH

4 I, MELISSA FERNANDEZ, Court Reporter, certify
5 that I was authorized to and did stenographically report
6 the foregoing deposition, and that the transcript is
7 a true record of the stenographic notes.

8 I further certify that I am not a relative,
9 employee, attorney, or counsel of any of the parties,
10 nor am I a relative or employee of any of the parties'
11 attorney or counsel connected with the action, nor am
12 I financially interested in the action.

13 Dated this 27th day of May, 2025.

15 *Melissa Fernandez*
16 _____

17 MELISSA FERNANDEZ
Court Stenographer

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